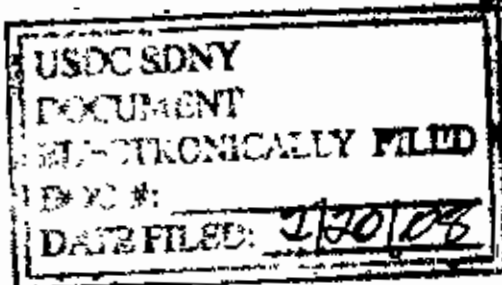


**MEMO ENDORSED**

See p. 2



MICHAEL A. CARDOZO  
Corporation Counsel

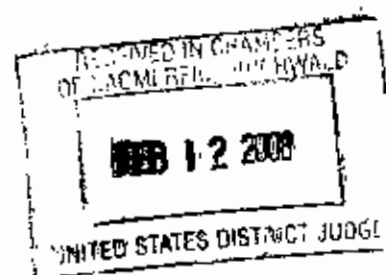
THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

JOSHUA R. FAY  
Labor and Employment Law Division  
Phone: (212) 788-8699  
Fax: (212) 788-8877  
E-mail: jfay@law.nyc.gov

February 12, 2008

**By Facsimile**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



Re: Kingsley v. NYPD, et al.  
07 CV 7629 (NRB)

Dear Judge Buchwald:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the defendants the New York City Police Department ("NYPD"), the City of New York, Police Commissioner Raymond Kelly, and Deputy Inspector Vincent Guerriera (collectively "defendants") in the above-referenced action.

This letter is submitted in order to propose a schedule for proceeding with discovery in this matter. I have attempted to contact the plaintiff *pro se* on numerous occasions to discuss this schedule and have left her multiple messages. To date, I have been unable to discuss this schedule with her.

MEMO ENDS-1313

Defendants propose the following schedule for the Court's approval:

Deadline for service of initial disclosures required by Rule 26(a):	February 28, 2008
Deadline for joinder of additional parties and amendment of pleadings	March 15, 2008
First Request for production of documents and first request for interrogatories due by:	March 21, 2008
All discovery to be completed by:	July 1, 2008

So Ordered.  
*Samuel R. Friedman*  
USDC  
2/20/08

Thank you for your consideration of this request.

Respectfully submitted,

*Joshua Fay*  
Joshua Fay  
Assistant Corporation Counsel

cc: Sonja Kingsley  
Plaintiff *pro se*  
(By Overnight Mail)